

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*,

No. 2:20-cv-00424-JHC

Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation,

ORDER RE: PLAINTIFFS' MOTION
FOR AN ORDER REGARDING
PROTECTIVE ORDER STANDARDS
APPLICABLE TO CLAW BACKS IN
PLAINTIFFS' CASES

Defendant.

ELIZABETH DE COSTER, *et al.*,

No. 2:21-cv-00693-JHC

Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

CHRISTOPHER BROWN, *et al.*,

No. 2:22-cv-00965-JHC

Plaintiffs.

V.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

**ORDER RE: PROTECTIVE ORDER STANDARDS
APPLICABLE TO CLAW BACKS IN PLAINTIFFS'**

1 This matter comes before the Court on Plaintiffs' Motion for an Order Regarding
2 Protective Order Standards Applicable to Claw Backs in Plaintiffs' Cases (the Motion). Case
3 No. 20-424, Dkt. # 320; Case No. 21-693, Dkt. # 352; Case No. 22-965, Dkt. # 194. The Court
4 has considered the materials filed in support of and in opposition to the motion, the rest of the
5 file, and the governing law. Being fully advised, the Court GRANTS in part and DENIES in part
6 Plaintiffs' motion.

To claw back any documents in Plaintiffs' cases, Amazon must make a showing of inadvertence under Rule of Evidence 502(b), regardless of whether the documents were produced to Plaintiffs after having been previously produced in another action, or initially withheld in another action on the basis of privilege and produced first to Plaintiffs. *See* Case No. 20-424, Dkt. ## 294, 312; Case No. 21-693, Dkt. ## 302, 329; Case No. 22-965, Dkt. ## 170, 185. The Court declines to find waiver or award fees and costs.

13 DATED: July 17, 2025.

John H. Chan

John H. Chun
United States District Judge

ORDER RE: PROTECTIVE ORDER STANDARDS
APPLICABLE TO CLAW BACKS IN PLAINTIFFS'
CASES - 1
Case Nos. 2:20-cv-00424-JHC, 2:21-cv-00693-JHC,
2:22-cv-00965-JHC